

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of

Amendment of Section 73.622(b),  
Table of Allotments,  
Digital Television Broadcast Stations  
(Norwich, Connecticut)

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MM Docket No. 04-184  
RM-10968

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To: Secretary, FCC  
ATTN: Chief, Video Division

JUL - 6 2004

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**COMMENTS IN SUPPORT OF PROPOSED RULE MAKING**

These comments are filed on behalf of Connecticut Public Broadcasting, Inc. ("CPBI"), licensee of noncommercial educational Station WEDN(TV), NTSC Channel \*53/Digital Channel \*45, Norwich, Connecticut. CPBI is the proponent of the proposal set forth in the above-captioned Notice of Proposed Rule Making to substitute DTV Channel \*9c for its assigned DTV Channel \*45.

CPBI hereby supports the expeditious adoption of the proposal. For the reasons set forth in the Petition, which are summarized in the Notice and which are hereby incorporated by reference, the DTV Table of Allotments should be amended as proposed. In brief, the proposed channel substitution will lead to an improved, interference-free DTV service to Norwich while reducing CPBI's operating costs. CPBI will promptly apply for DTV Channel \*9c when it is allotted and, when authorized, will promptly modify its DTV station using that channel within the time limits specified by the Commission.

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In view of this showing, the DTV channel substitution should be made as proposed.<sup>1</sup>

Respectfully submitted,

CONNECTICUT PUBLIC BROADCASTING, INC.

By:   
Steven C. Schaffer  
[schaffer@swmlaw.com](mailto:schaffer@swmlaw.com)

SCHWARTZ, WOODS & MILLER  
1350 Connecticut Avenue, N.W.  
Suite 300  
Washington, D.C. 20036-1717

Telephone: 202-833-1700  
Facsimile: 202-833-2351

Its Attorneys

July 6, 2004

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<sup>1</sup>CPBI notes that it has pending applications to exchange DTV Channel \*45 at Norwich for the digital channel assigned to CPBI's Hartford station, in applications submitted pursuant to Sections 73.622(c) and 73.623(g) of the Commission's rules (FCC File Nos. BMPEDT-20031008AAT and BPEDT 19990113KG, as amended on October 8, 2003 and as further amended on March 18, 2004). Those applications were submitted to initiate digital television service in Hartford on DTV Channel \*45, and continuation of service (albeit at lower power) on DTV Channel \*32 at Norwich. CPBI would implement those facilities as proposed, but submits that the proposal for Channel \*9 at Norwich is superior to either DTV Channel \*45, the present allotment, or DTV Channel \*32, the allotment which would be substituted at Norwich in the event that the channel "swap" applications are approved and implemented. If required following implementation of the channel "swap" proposed in those applications, CPBI would supplement the instant rulemaking record with the comparisons of \*9 to \*32 as appropriate.